



Order Filed on November 9, 2020
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886

Harold Kaplan (HK0226)

In Re:

Fred C. Bauer, Jr.,

Debtor,

Case No.: 18-12566-MBK

Chapter: 13

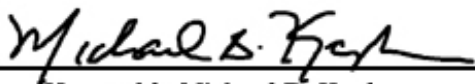
Hearing Date: October 20, 2020

Judge: Michael B. Kaplan

**AGREED ORDER RESOLVING SECURED CREDITOR'S CERTIFICATION OF
DEFAULT**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: November 9, 2020


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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Secured Creditor: NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER

Secured Creditor's Counsel: RAS Citron, LLC

Debtors' Counsel: Andrew Thomas Archer, Esq.

Property Involved ("Collateral"): 3 Pinyon Street, Howell, New Jersey 07731

Relief sought: ■ Certification of Default

For good cause shown, it is **ORDERED** that Secured Creditor's Certification(s) is (are) resolved, subject to the following conditions:

1. Status of post-petition arrearages:

- The Debtor is overdue for 1 month from October 1, 2020.
- The Debtor is overdue for 1 payment from October 1, 2020 at \$1,969.59 per month.

Funds Held In Suspense \$1,288.88.

Total Arrearages Due \$680.71.

2. Debtor must cure all post-petition arrearages, as follows:

- Immediate payment shall be made in the amount of \$680.71. Payment shall be made within 14 days of entry of this Order.
- Beginning on November 1, 2020, regular monthly mortgage payments shall continue to be made in the amount of \$1,969.59.

3. Payments to the Secured Creditor shall be made to the following address(es):

- Immediate cure payment: Nationstar Mortgage LLC
Attn: Bankruptcy Dept
PO Box 619094
Dallas, TX 75261-9741
- Regular monthly payment: Nationstar Mortgage LLC
Attn: Bankruptcy Dept
PO Box 619094
Dallas, TX 75261-9741

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

The fees and costs are payable:

■ Through the Chapter 13 plan.

□ To the Secured Creditor within _____ days.

□ Attorneys' fees are not awarded.

6. In the event Secured creditor has not filed a timely Proof of Claim, Debtor consents to the filing and payment by the Chapter 13 Trustee of any late filed Proof of Claim, subject to the right of the Debtor to file an objection as to the amount.

The undersigned hereby consent to the form and entry of the foregoing order.



Andrew Thomas Archer, Esq.

Attorney for Debtor(s)

Date: 11/5/2020

/s/ Harold Kaplan

Harold Kaplan, Esq.

Attorney for Secured Creditor

Date: 11/5/2020

In re:
Fred C. Bauer, Jr.
Debtor(s)

Case No. 18-12566-MBK
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-3
Date Rcvd: Nov 09, 2020

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 11, 2020:

Recip ID	Recipient Name and Address
db	+ Fred C. Bauer, Jr., 3 Pinyon Street, Howell, NJ 07731-2808

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 11, 2020

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 9, 2020 at the address(es) listed below:

Name	Email Address
Albert Russo	docs@russotrustee.com
Albert Russo	on behalf of Trustee Albert Russo docs@russotrustee.com
Aleisha Candace Jennings	on behalf of Creditor Nationstar Mortgage LLC ajennings@rasflaw.com
Aleisha Candace Jennings	on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER ajennings@rasflaw.com
Andrew Thomas Archer	on behalf of Debtor Fred C. Bauer Jr. aarcher@spillerarcherlaw.com, bankruptcy@brennerlawoffice.com;mcdoherty_187750@ecf.courtdrive.com;R64966@notify.bestcase.com
Denise E. Carlon	

District/off: 0312-3

User: admin

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Date Rcvd: Nov 09, 2020

Form ID: pdf903

Total Noticed: 1

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER dcarlon@kmlawgroup.com
bkgroup@kmlawgroup.com

Harold N. Kaplan

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER hkaplan@rasnj.com informationathnk@aol.com

Laura M. Egerman

on behalf of Creditor FEDERAL NATIONAL MORTGAGE ASSOCIATION bkyecf@rasflaw.com
bkyecf@rasflaw.com;legerman@rasnj.com

Melissa N. Licker

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER NJ_ECF_Notices@mccalla.com
mccallaecf@ecf.courtdrive.com

Rebecca Ann Solarz

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER rsolarz@kmlawgroup.com

Shauna M Deluca

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER sdeluca@rasflaw.com

Sindi Mncina

on behalf of Creditor FEDERAL NATIONAL MORTGAGE ASSOCIATION smncina@rascrane.com

Sindi Mncina

on behalf of Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER smncina@rascrane.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 14